



3855 North Ocoee Street  
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Superfund Records Center  
SITE: Peterson Puritan 042  
BREAK: 11.9  
OTHER: 526872  
PE 0442

**Curt M. Richards**  
Corporate Vice President,  
Environment, Health & Safety

March 4, 2014

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

U. S. Environmental Protection Agency Records Center  
c/o Peterson/Puritan, Inc. Superfund Site  
5 Post Office Square, Suite 100, OSRR 02-3  
Boston, MA 02109-3912

Re: Response to Information Pursuant to Section 104 of CERLA and Section 3007 of RCRA for the Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J. M. Mills Landfill in Cumberland, RI.

Dear Sir:

Enclosed is Olin's response on behalf of The North Terminal Company to the USEPA Request for Information regarding the Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J. M. Mills Landfill in Cumberland, RI (the "Site").

Based upon Olin's review of available documents, Olin Corporation acquired North Terminal, Inc. May 1, 1972. North Terminal, Inc. was dissolved October 17, 1977. In 1977 North Terminal Company became a Division of Olin Corporation. Olin Corporation sold the North Terminal Company business and operations to U.S. Repeating Arms, Inc. effective July 21, 1981.

Olin has found no documents in its possession relating to the operations at the 100 Research Road, Hingham, MA manufacturing facility. Any records pertaining to the facility would have been transferred as part of the sale of the business to U. S. Repeating Arms, Inc. Accordingly, Olin currently has no information or records regarding operations or production processes at the facility. Olin has not been able to identify any former employees from the facility.

Based upon a review of the information that USEPA provided with the Request for Information, the material sent to the Site was shop waste, and the volume of material sent to the Site during Olin's ownership from May 1, 1972 to July 20, 1981 would have been de-minimis.

Olin, on behalf of The North Terminal Company, requests a de-minimis settlement based upon findings that the amount of material contributed by The North Terminal Company is minimal in comparison to the amount of other hazardous substances at the Site, the toxic or other hazardous effects, if any, of the material contributed by The North Terminal Company are minimal in comparison to other hazardous substances at the Site, and the settlement is in the public interest and involves only a minor portion of the response costs at the Site.



Re: Response to Information Pursuant to Section 104 of CERLA and Section 3007 of RCRA for the Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J. M. Mills Landfill in Cumberland, RI.

March 5, 2014

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If USEPA has additional information regarding The North Terminal Company's involvement at the Site, please forward to me for review. I am the point of contact for future communications from USEPA regarding this Site.

Sincerely,

OLIN CORPORATION

On behalf of The North Terminal Company

By: 

Curt M. Richards  
Corporate Vice President,  
Environment, Health & Safety

## **INFORMATION REQUEST QUESTIONS**

### **General Objections**

Olin Corporation ("Olin") objects to each and every question to the extent it exceeds the authority of EPA under Section 104(e) of CERCLA, insofar as a particular question fails to limit the scope of the inquiry to:

1. The identification, nature and quantity of materials which have been or are generated, treated, stored or disposed of at the Site (as defined in the Request for Information) as provided in CERCLA Section 104(e)(2)(A), 42 U.S.C. Section 9604(e)(2)(A);
2. The nature or extent of a release of a hazardous substance or pollutant or contaminant at or from the Site, as provided in CERCLA Section 104(e)(2)(B), 42 U.S.C. Section 9604(e)(2)(B);
3. Information relating to the ability of Olin to pay for or perform a cleanup, as provided in CERCLA Section 104(e)(2)(C), 42 U.S.C. Section 9604(e)(2)(C).

For each and every question, Olin objects to the definitions and instructions included in the Information Request as overbroad, vague and ambiguous, and as exceeding the scope of EPA's authority for purposes of a CERCLA Section 104(e) information request.

Olin objects to each question to the extent the question asks for information or documents protected by the attorney-client privilege, the attorney work-product privilege, the privilege related to materials generated in anticipation of litigation and/or any other applicable privilege. Olin objects to each question to the extent that it requires a legal conclusion, which exceeds the scope of EPA's authority under CERCLA Section 104(e).

Olin objects to each question to the extent the question seeks documents or information already in the possession of a government agency and/or already in the public domain. Any documents produced herein that are included in this category are produced without waiver of this or any other objection.

These General Objections are incorporated by reference into each of the responses set forth below to the fullest extent applicable. Olin provides the responses set forth below subject to, and without waiving, these General Objections and any additional objections set forth in response to the individual requests.

#### 1. General Information About Respondent

**NOTE: All questions in this section refer to the present time unless otherwise indicated.**

- a. Provide the full legal name and mailing address of the Respondent.

**The North Terminal Company  
Division of Olin Corporation  
190 Carondelet Plaza, Suite 1530  
Clayton, MO 63105**

**Olin Corporation acquired North Terminal, Inc. May 1, 1972. North Terminal, Inc. was dissolved in 1977. In 1977 The North Terminal Company became a Division of Olin Corporation. Olin Corporation sold the operation to U.S. Repeating Arms, Inc. effective July 21, 1981.**

- b. For each person answering these questions on behalf of Respondent provide:

**Olin objects to identifying all persons consulted in the preparation of the answers to these requests to the extent such persons did not have relevant information used in the preparation of Olin's response, or to the extent such consultations are subject to the attorney-client privilege, the attorney work-product privilege, the privilege related to materials generated in anticipation of litigation and/or any other applicable privilege. Subject to and without waiving its General Objections and these specific objections, the following Olin employees provided information relevant to the preparation of this response:**

- i. full name;
- ii. title;
- iii. business address; and
- iv. business telephone number, FAX machine number and e-mail address.

**Curt Richards - Corporate Vice President, EH&S  
Olin Corporation  
3855 North Ocoee Street  
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Cleveland, TN 37312  
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CMRichards@olin.com**

**Rhonda Hazlett - Records Coordinator  
Olin Corporation  
3855 North Ocoee Street  
Suite 200  
Cleveland, TN 37312  
(423) 336-4053  
RSHazlett@olin.com**

**Allison Elmore - Corporate Records Officer**  
Olin Corporation  
3855 North Ocoee Street  
Suite 200  
Cleveland, TN 37312  
(423) 336-4616  
MAElmore@olin.com

**Beth Baltimore - ERG Office Manager**  
Olin Corporation  
3855 North Ocoee Street  
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Cleveland, TN 37312  
(423) 336-4878  
BABaltimore@olin.com

**Dennis Turner - Director, Corporate Purchasing**  
Olin Corporation  
3855 North Ocoee Street  
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(423) 336-4767  
DJTurner@olin.com

**Dawn Martel - Analyst Procurement**  
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Cleveland, TN 37312  
(423) 336-4108  
DGMartel@olin.com

**Amy J. Watson - Paralegal**  
Olin Corporation  
600 Powder Mill Road  
East Alton, IL 62024  
Phone: (618) 258-2730  
AJWatson@olin.com

**Valerie Peters - Director, Human Resources**  
Olin Corporation  
190 Carondelet Plaza, Suite 1530,  
Clayton, MO 63105-3443  
Off: 314.480.1478  
VAPeters@olin.com

- c. If Respondent wishes to designate an individual for all future correspondence concerning the Site, including any legal notices, please so indicate here by providing that individual's name, mailing address, telephone number, FAX number, and e-mail address.

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- d. List the Standard Industrial Classification ("SIC") code for Respondent.

**During the time The North Terminal Company was a division of Olin Corporation, the SIC code was: 3484**

- e. Describe the nature of Respondent's business during the period being investigated.

**The North Terminal Company, while a division of Olin Corporation, manufactured Model 9422 Rimfire rifle receivers, frames and other firearm related products (no other information available).**

- f. Identify all surveys, studies, or collections of data for which Respondent submitted information to local, state, federal, or private entities about its waste disposal/recycling practices.

**No information found.**

- g. Provide a copy of the information submitted by Respondent for such survey or study.

**No information found.**

- h. Provide a copy of the resulting survey, study, or collection of data.

**No information found.**

- i. Provide the names of all Superfund sites throughout the country for which Respondent has received notification of its potential liability from EPA and the dates of such notification(s).

**None for The North Terminal Company, a Division of Olin Corporation.**

- j. Provide the name of all Superfund sites in Region 1 (New England) for which Respondent has received a request for information from EPA.

**None for The North Terminal Company, a Division of Olin Corporation.**

2. Respondent's Legal and Financial Status

**NOTE: All questions in this section refer to the present time unless otherwise indicated.**

- a. State the number of Respondent's current employees.

**None for The North Terminal Company.**

- b. If the Respondent has ever done business under any other name;

- i. list each such name; and

**North Terminal, Inc.**

- ii. list the dates during which such name was used by Respondent.

**1972 to 1977.**

- c. If the Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not limited to:

- i. a general statement of the nature of the relationship;
- ii. the nature of the corporation or entity's operations;
- iii. the dates such relationship existed;
- iv. the percentage of ownership of Respondent that is held by such other entity; and
- v. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.

**Olin Corporation acquired North Terminal, Inc. in 1972. North Terminal, Inc. dissolved in 1977. In 1977, the business and operations formerly operating as North Terminal, Inc. became The North Terminal Company, a Division of Olin Corporation. Olin Corporation sold the business and its operations to U.S. Repeating Arms, Inc. effective July 21, 1981.**

3. Information About Others:

- a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site that is not included in the information you have already provided, provide all such information.

- b. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

**Olin Corporation sold the business and its operations to U.S. Repeating Arms, Inc. effective July 21, 1981. Records pertaining to the The North Terminal Company facility would have been included as part of that transaction. Accordingly, U.S. Repeating Arms, Inc. may have documents pertaining to operations at the Facility.**

- c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

**No information found.**

4. Compliance with This Request:

- a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:
- i. the names of all individuals consulted;
  - ii. the current job title and job description of each individual consulted;
  - iii. the job title and job description during the period being investigated of each individual consulted;
  - iv. whether each individual consulted is a current or past employee of Respondent;
  - v. the names of all divisions of Respondent for which records were reviewed;
  - vi. the nature of all documents reviewed;
  - vii. the locations where those documents reviewed were kept prior to review; and
  - viii. the location where those documents reviewed are currently kept.

**The following list of individuals searched Olin records for compliance with this request:**

**None of these employees are past or current employees of Respondent.**

**Curt Richards - Corporate Vice President, EH&S  
Rhonda Hazlett - Records Coordinator  
Allison Elmore - Corporate Records Officer  
Beth Baltimore - ERG Office Manager  
Dennis Turner - Director, Corporate Purchasing  
Dawn Martel - Analyst Procurement**



Amy J. Watson – Paralegal  
Sharon Doughty – Director, Benefit Programs  
John Higdon – Manager – Corporate Pension  
Cindy Bennett – Manager, HR Operations  
Kim Murphy – Supervisor, HR Winchester  
Celeste Lockwood – Supervisor, Benefits – Retiree Services  
Monica Knight – Administration - Pension

5. Respondent's Operations

**NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.**

**ALSO NOTE: The following questions refer to North Terminal's facility located in Hingham, Massachusetts.**

a. Provide any and all information Respondent has about the nature of operation at the facility including:

i. the date such operations commenced and concluded at the facility;

**Olin Corporation acquired North Terminal, Inc. May 25, 1972.**

**Olin Corporation sold the business and operations to U.S. Repeating Arms, Inc., effective July 21, 1981.**

ii. if transferred or moved to a new facility, the date and location of where such operations transferred for each facility;

**No information found.**

iii. if the nature or size of the operations changed over time, describe those changes and the dates they occurred for each facility; and

**No information found.**

iv. the types of work performed, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

**The North Terminal Company, while a division of Olin Corporation, manufactured Model 9422 Rimfire rifle receivers, frames and other [firearm-related] products (no other information available).**

b. If the nature or size of Respondent's operation changed over time, describe those changes and the dates they occurred.

**No information found.**

- c. List the products Respondent manufactured, recycled, recovered, treated, or otherwise processed at the operation.

**No information found.**

- d. In general terms, list the types of raw materials used at Respondent's operation.

**No information found.**

- e. Provide copies of Material Safety Data Sheets ("MSDS") for materials used at the Respondent's operation.

**No information found.**

- f. Describe the cleaning and maintenance of the equipment and machinery involved at the operation, including but not limited to:

- i. the types of materials used to clean/maintain this equipment/machinery; and
- ii. the monthly or annual quantity of each such material used.

**No information found.**

- g. Describe the methods used to clean up spills of liquid or solid materials at Respondent's operation, including but not limited to:

- i. the types of materials spilled at Respondent's operations;
- ii. the materials used to clean up those spills;
- iii. the methods used to clean up those spills; and
- iv. where the materials used to clean up those spills were disposed of.

**No information found.**

6. Respondent Business's Waste and Waste Streams (Including By-Products)

**NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.**

**ALSO NOTE: The following questions refer to North Terminal's facility located in Hingham, Massachusetts.**

- a. Complete the enclosed Waste Survey Chart (Enclosure C) for each facility Respondent operated. Check each substance present in Respondent's wastes or by-products and provide all requested information for each such substance that is checked.

**No information found.**

- b. For each type of waste (including by-products) from Respondent's operation, including but not limited to all liquids, sludges, oils, metals, chemicals, solid waste, and mixed solid waste, provide the following information:
- i. its physical state;
  - ii. its nature and chemical composition;
  - iii. its color;
  - iv. its odor;
  - v. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds); and
  - vi. the dates (beginning and ending) during which each type of waste was produced by each type of Respondent's operations.

**No information found.**

- c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container in which the waste was place/stored; and
- ii. where the waste was collected/stored.

**No information found.**

- iii. Identify (see Definitions) the person(s) responsible for collecting and managing each type of waste.

**No information found.**

- d. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container in which each type of waste was placed/stored; and
- ii. where each type of waste was collected/stored.

**No information found.**

For the following question, please refer to Attachment No. 1 which contains Cal's log reports and receipts demonstrating that Respondent arranged for the transport and disposal of its waste at the Site from at least 1978 to 1982. Please define, quantify, and/or explain the following:

- i. the nature and chemical composition of the contents of each type of container;
- ii. the volume of such materials shipped to the Site for disposal annually;
- iii. the frequency with which such materials were shipped to the Site for disposal; and
- iv. whether any MSDS or other required reporting documents were submitted for such materials.

**No information found.**

- e. For the following question, please refer to Attachment No.2 which includes a driver interview summary taken from a driver for Cal's which was transported from North Terminal to the Site. Please define, quantify, and/or explain the following:
- i. the nature and chemical composition of each type of assorted shop waste including, but limited to, oils, metals and metal shavings;
  - ii. the processes used which resulted in the generation of shop waste including, but not limited to, oils, metals and metal shavings;
  - iii. the ultimate disposal location of each type of shop waste including, but not limited to, oils, metals and metal shavings (e.g., dumpster, landfill);
  - iv. the volume of shop waste including, but not limited to, oils, metals metal shavings; and
  - v. the frequency of waste shipped to the Site.

**No information found.**

- f. Provide any and all information Respondent has on the following:
- i. the documentation showing the destination of all waste transported by Cal's during the period of investigation; and
  - ii. detailed description of any waste that was self hauled by North Terminal (e.g., types of waste self hauled, specific years of self hauling, and ultimate disposal locations).

**No information found.**

7. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By- Products)

**NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.**

**ALSO NOTE: Your response to questions in this section must refer to all locations, including but not limited to the Site, to which Respondent sent its wastes.**

- a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes.

**No information found.**

- b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal/treatment/storage/recycling/sale of Respondent's wastes.

**No information found.**

- c. Identify (see Definitions) all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

**No information found.**

- d. For the previous three responses, also provide each individual's:
- i. job title;
  - ii. duties;
  - iii. dates performing those duties;
  - iv. supervisors for those duties; and
  - v. the nature of the information possessed by such individuals concerning Respondent's waste management.

**No information found.**

- e. Describe the containers used to take each type of waste listed in response to Question 6(b) from Respondent's operation, including but not limited to:
- i. the type of container (e.g., 55 gal. drum, dumpster);
  - ii. the colors of the containers;
  - iii. any distinctive stripes or other markings on those containers;
  - iv. any labels or writing on those containers (including the content of those labels);
  - v. whether those containers were new or used; and
  - vi. if those containers were used, a description of the prior use of the containers.

**No information found.**

- f. For each type of waste listed in response to Question 6(b), describe Respondent's contracts, agreements, or other arrangements for disposal, treatment, or recycling.

**No information found.**

- g. Provide copies of such contracts and other documents reflecting the contracts, agreements, or arrangements made for each type of waste listed in response to Question 6(b).

**No information found.**

- h. State where Respondent sent each type of waste listed in response to Question 6(b) for disposal, treatment, or recycling.

**No information found.**

- i. Identify (see Definitions) all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carrier" or "Waste Carriers" for purposes of this Information Request).

**No information found.**

- j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to Waste Carriers with reference to Respondent's actions.

**No information found**

- k. For each type of waste listed in response to Question 6(b), specify which Waste Carrier transpired such waste away from Respondent's operations.

**No information found.**

- l. For each type of waste listed in response to Question 6(b), state how frequently each Waste Carrier transported such waste away from Respondent's operations.

**No information found.**

- m. For each type of waste listed in response to Question 6(b), state the volume of such waste each Waste Carrier transported from Respondent's operations (per week, month, or year).

**No information found.**

- n. For each type of waste listed in response to Question 6(b), state the dates (beginning and ending) each Waste Carrier transported such waste from Respondent's operations.

**No information found.**

- o. Provide copies of all documents containing information responsive to the previous six questions (i.e., Questions 7(i) through 7(n)).

**No information found.**

- p. Describe the vehicles used by each Waste Carrier to haul away each type of waste including but not limited to:

- i. the type of vehicle (e.g., flatbed truck, tanker truck, containerized dumpster truck);
- ii. size of the vehicle (e.g., 6-yard container, 10-wheel, roll-off); and
- iii. names or markings on the vehicles.

**No information found.**

- q. Identify (see Definitions) all employees from each Waste Carrier who transported waste from Respondent's operations.

**No information found.**

- r. State the ultimate disposal/recycling/treatment location for each type of waste listed in response to Question 6(b).

**No information found.**

- s. Provide all documents indicating the ultimate disposal/recycling/treatment for each waste location listed in response to Question 7(r).

**No information found.**

- t. Describe how Respondent managed pickups of each waste, including but not limited to:

- i. the method for inventorying each type of waste;
- ii. the method for requesting each type of waste to be picked up;
- iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
- iv. the amount paid or the rate paid for the pickup of each type of waste;
- v. the identity of (see Definitions) Respondent's employee who paid the bills; and
- vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.

**No information found.**

- u. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

**No information found.**

- v. Explain the reasoning for and provide any supporting documents related to the selection of each location for waste disposal for each type of waste listed in Question 6(b).

**No information found.**

- w. If not already-provided, specify the dates and circumstances when Respondent's waste was taken to the Site, and identify the companies or individuals who brought Respondent's waste to the Site. Provide all documents which support or memorialize your response.

**No information found.**

8. Respondent's Environmental Reporting

**NOTE: All questions in this section refer to the period being investigated.**

- a. Identification Numbers issued to Respondent by EPA or a state for Respondent's operation.

**MAD001053834**

- b. Identify (see Definitions) all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

**No information found.**

- c. State the years during which such information was sent/filed.

**No information found.**

- d. Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

**No information found.**

- e. State the years during which such information was sent/filed.

**No information found.**

- f. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq., ("TSCA"); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. §§ 1101 et seq., ("EPCRA"); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. §§ 1251 et seq.

**No information found.**

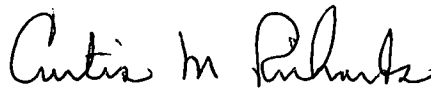


The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

#### DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of The North Terminal Company, Division of Olin Corporation and that the Respondent foregoing is complete, true, and correct.

Executed on March 4, 2014.



Signature

**Curtis M. Richards**

Type Name

**Corporate Vice President, EH&S  
Olin Corporation**

Title [if any]

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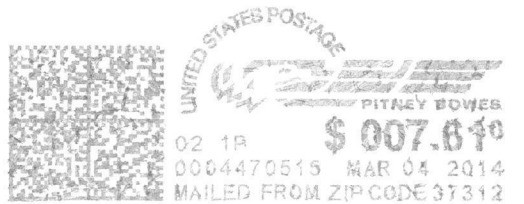
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# First Class Mail

Chris Ferry

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